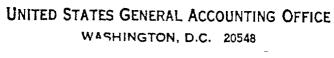
098158



Energy and Winerals Division XOPPXXXXXX PERFECTATE TEXT OF RAMES. XXXXXXXXXXX KKECOLOKYSKA KKKKKKKKOFONRA KARLELITYEK

B-183920'

1976 .IUN 4

The Honorable Robert C. Seamans, Jr. BEST DOCUMENT AVAILABLE Administrator, Energy Research and 66 Development Administration

Dear Dr. Seamans:

During our review of the safeguards and security of the Energy Research and Development Administration's (ERDA) Rocky Flats Plutonium Facility, being conducted at the request of $C_1 + R$ Congressman Timothy E. Wirth (Colorado), we have noted a situation that warrants your immediate attention.

> In the recent past ERDA has required its contractors proposing to build facilities for handling special nuclear materials (SNM) -- enriched uranium and plutonium -- to make and document in a Safety Analysis Report (SAR) an overall analysis of how the proposed facility will protect the health and safety. of the public. Generally, the analysis includes a safety evaluation of, among other things, (1) site characteristics, (2) plant design, (3) possible accidents, (4) natural phenomena associated with the region in which the facility will be built, and (5) the operating limits of the proposed facility. analysis is submitted to ERDA for review. It is used by ERDA to insure that the proposed facility is designed, constructed, and operated in a safe manner and that environmental protection and health and safety matters are comprehensively addressed with all risks identified and reduced to an acceptably low level.

> ERDA does not, however, require its contractors to make current analyses and prepare SARs for existing facilities handling SNM to determine whether all safety risks have been identified and reduced to an acceptably low level. ERDA officials told us that several of its field offices have requested its contractors to perform such analyses and prepare written reports. Such analyses are at the discretion of the individual field office and consequently, their scope and detail

> > BEST DOCUMENT AVAILABLE

7

may vary between field offices and between facilities. In some cases safety analyses and reports may be deferred because of other higher priority work or because funds are not available.

Such a situation occurred at ERDA's Rocky Flats Plant. 1972 the Albuquerque Operations Office (ALO) instructed the contractors under its jurisdiction to conduct necessary safety analyses and to prepare SARs for the facilities they operated, but as of May 1976, although some analyses have been made on certain aspects of operations, no SARs have been completed at Rocky Flats. ERDA and contractor officials explained that they had scheduled completion of SARs on existing plutonium buildings at the plant by 1976, but that this was delayed because of (1) a lack of manpower and priority attention to preparation of an SAR on a new Plutonium Recovery and Waste Treatment Facility under construction and (2) the need to prepare the draft environmental impact statement for the plant site. Although the original schedule was approved by ALO, we found no evidence that the operations office provided further follow-up to assure the schedule was met. On the basis of our discussion with ERDA officials, it appears that the SARs were thought to be needed but were not considered urgent.

The Division of Safety, Standards, and Compliance has proposed a change to ERDA procedures whereby its contractors would be required to make and formally document safety analyses for all existing ERDA facilities that handle nuclear material. The Deputy Director of this Division told us that Division officials feel there is a need for an ERDA-wide policy with headquarters overview responsibility for safety analyses of all ERDA facilities to assure management that there are no undue risks to the health and safety of the public. This proposed procedure was originally drafted and sent to ERDA divisions and field offices for comment in 1974. Comments have been incorporated into revised drafts. Division officials told us they are in the process of obtaining final concurrence from several operating divisions and that they do not believe the procedure will take effect until the end of calendar year 1976 at the earliest.

ERDA officials could not estimate the time necessary to implement such a procedure. Several issues will have to be resolved with the field offices and contractors such as time frames, personnel needs, and associated costs. ERDA officials believe that much of the information required for the safety evaluations on existing facilities should already be available and that this data will show that the facilities are operating in a safe manner with no undue risks.

Conclusions and Recommendations

Recent concern has been expressed by Congress and the public over the health and safety implications of nuclear operations--both public and private. Most recently, for example, Congress has held hearings on certain aspects of operations of the Kerr-McGee Plutonium Plant for the purpose of, among other things, helping to determine if the Federal Government is capable of adequately protecting the public from the health and safety hazards of plutonium. concern underscores the need for ERDA to develop a uniform and documented system to assure safe operations, identify unacceptable risks, and where necessary implement corrective action for all nuclear facilities under its control. We believe that an ERDA headquarters requirement for safety evaluations in a uniform manner with headquarters overview responsibilities will better assure that its workers and the public are adequately protected from unsafe conditions. Such a requirement should serve as an effective management tool to help assure that safety evaluations are consistently and uniformly conducted and that any unacceptable risks are identified and brought to the attention of senior ERDA management so that prompt decisions can be made on the best way to solve any identified problems. Accordingly, we recommend that ERDA expedite issuance and implementation of the proposed procedure to require documented safety analyses for all ERDA facilities that handle nuclear materials.

As you know, section 236 of the Legislative Reorganization Act of 1970 requires the head of a Federal agency to submit a written statement on actions taken on our recommendations to the House and Senate Committees on Government Operations not later than 60 days after the date of the report and to the House and Senate Committees on Appropriations with the agency's or first request for appropriations made more than 60 days after the date of the report.

We are sending copies of this report to the Director, Office of Management and Budget; the Chairman, Joint Committee on Atomic Energy; the Chairmen of the House and Senate Appropriations and Government Operations Committees; the Chairman of the Health Subcommittee of the Senate Committee on Labor and Public Welfare; the Chairman of the Subcommittee on Conservation, Energy, and Natural Resources of the House Committee on Government Operations; and Congressman Timothy E. Wirth.

B-183920

We appreciate the courtesy and cooperation extended to our representatives during this work. We shall appreciate leing informed of the action you take on our recommendation.

Sincerely yours,

Monte Canfield, Jr.

Director

BEST DOCUMENT AVAILABLE